

IN THE UNITED STATES DISTRICT COURT
FOR THE NEW HAMPSHIRE

IN RE: HOMELAND SECURITY
INVESTIGATIONS
SUMMONS NO. ICE-HSI-MF-2021-00072

Case No. 1:20-mc-00101

Filed Under Seal – Level I

MOTION TO EXTEND SEAL AT LEVEL I: ENTIRE MATTER
REGARDING HOMELAND SECURITY INVESTIGATIONS
SUMMONS

In the above captioned case, the United States of America respectfully moves to extend the seal at Level I, the entire matter including the application, the summons attachment, any order, and the corresponding docket text entries for 180 days, expiring on November 22, 2021, except that the government may later disclose these materials to comply with its discovery obligations under the local rules.

Under Federal Rule of Criminal Procedure 49.1(d) and Local Rule 83.12(a)(1), the Court has authority to grant this motion.

The Court should extend the seal of these documents because they contain sensitive information, which, if prematurely released, may compromise an ongoing criminal investigation. Accordingly, there is reason to believe that notification of the existence of the summons will seriously jeopardize the investigation or unduly delay a trial, including by giving targets an opportunity to flee or continue flight from prosecution, destroy or tamper with evidence, change patterns of behavior, intimidate potential witnesses, or endanger the life or physical safety of an individual. *See* 18 U.S.C. § 2705(b). Some of the evidence in this investigation is stored electronically. If alerted to the existence of the summons, the subjects under investigation could destroy that evidence, including information saved to their personal computers.

Motion To Extend Seal of Entire Matter Related to Summons
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This motion is not intended to preclude the executing officer from serving a copy of the application and a receipt for any property seized as required by Federal Rule of Criminal Procedure 41(f)(1)(C).

Respectfully submitted,

JOHN J. FARLEY
Acting United States Attorney

Dated: May 26, 2021

By: /s/ Georgiana L. MacDonald
Georgiana L. MacDonald
Assistant United States Attorney

Motion: ☐ Granted ☐ Denied

Andrea K. Johnstone
United States Magistrate Judge
United States District Court
District of New Hampshire
Date: _____